

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

TODD JANSON, GERALD T. ARDREY, CHAD M.
FERRELL, and C & J REMODELING, on behalf of
themselves and on behalf of all others similarly situated,

Plaintiff,

v.

LEGALZOOM.COM, INC.,

Defendants.

Case No. 2:10-cv-04018-NKL

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE RESPOND**

Defendant LegalZoom.com, Inc. (“LegalZoom”) respectfully moves this Court for an unopposed extension of time to move, plead, or otherwise respond in the above-captioned matter.

In support of its motion, LegalZoom states as follows:

1. On December 17, 2009, Plaintiff Todd Janson commenced this action by filing a petition (the “Petition”) against LegalZoom in the Circuit Court of Cole County, Missouri, captioned *Todd Janson on behalf of Himself and all Missourians similarly Situated v. LegalZoom, Inc.*, No. 09AC-CC00737. On January 15, 2009, Mr. Janson and additional Plaintiffs Gerald T. Ardrey, Chad M. Ferrell and C & J Remodeling LLC filed an Amended Class-Action Petition captioned *Todd Janson, Gerald T. Ardrey, Chad M. Ferrell and C & J Remodeling LLC, on behalf of themselves and on behalf of all others similarly situated v. Legalzoom.com, Inc.*, No. 09AC-CC00737 (“Amended Petition”).

2. LegalZoom was served with the Amended Petition on January 8, 2010.

3. The matter was timely removed to this Court from the Circuit Court of Cole County, Missouri, on February 5, 2010.

4. Under the Federal Rules of Civil Procedure, LegalZoom's response to the Amended Petition is currently due on February 12, 2010, seven days after the case was removed. Fed. R. Civ. P. 81(c)(2)(C).

5. The Amended Petition alleges that LegalZoom violated the Missouri statute prohibiting the unauthorized practice of law, § 484.020, RSMo., and that this unauthorized practice of law violates the Missouri Merchandising Practices Act. (Amended Petition ¶¶ 34-51.) The Amended Petition seeks, among other relief, refund of all monies paid to LegalZoom in the last five years "for the preparation of legal documents" by all customers residing in Missouri. Plaintiffs allege that certain of these customers are entitled to treble damages under § 484.020, RSMo.

6. The Amended Petition raises a number of legal and factual questions, and LegalZoom requires additional time to address these issues in order to formulate a responsive pleading.

7. Plaintiffs' counsel has stated that Plaintiffs do not oppose this motion.

WHEREFORE, Defendant LegalZoom, Inc. respectfully requests that this Court grant its motion for an extension of time up to and including February 26, 2010, to answer or otherwise respond to the Amended Petition.

Dated: February 11, 2010

Respectfully submitted,

BRYAN CAVE LLP

By: /s/ John Michael Clear

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Attorneys for LegalZoom.com, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2010, the foregoing was served by overnight mail on the individuals listed below and electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

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